

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

**PLAINTIFFS' NOTICE OF DAUBERT MOTION TO EXCLUDE THE
TESTIMONY OF DEFENSE EXPERT DANIEL CATENACCI, M.D.**

TO: Seth A. Goldberg, Esq.
Duane Morris LLP
30 South 17th Street
Philadelphia, Pennsylvania 19103-4196
Attorneys for Defendants

PLEASE TAKE NOTICE that pursuant to Case Management No. 23 Revised, Plaintiffs shall move before the Honorable Robert B. Kugler, U.S.D.J., and the Honorable Thomas I. Vanaskie, Special Master, at the United States District Court for the District of New Jersey, 1 John F. Jerry Plaza, 4th and Cooper Streets, Camden, New Jersey, for an Order Excluding the Testimony of Daniel Catenacci, M.D.

PLEASE TAKE FURTHER NOTICE that Plaintiffs shall rely upon the Brief and Certification of Adam M. Slater in support of the Motion.

PLEASE TAKE FURTHER NOTICE that plaintiffs request oral argument pursuant to L. Civ. R. 78.1.

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: November 1, 2021

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2021, I electronically filed a partially redacted version of the foregoing documents with the Clerk of the Court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL. In addition, I hereby certify that unredacted copies of foregoing document will be served contemporaneous to filing via email on the Court, Special Master, and the Defense Executive Committee at DECValsartan@btlaw.com.

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: November 1, 2021